

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

Zimmer Biomet Holdings, Inc.,

*Plaintiff,*

v.

Mary N. Insall, as Executrix of  
The Estate of John N. Insall,

*Defendant.*

Case No. 1:22-cv-2575

Judge: *[To be assigned]*

**ZIMMER BIOMET’S MOTION FOR LEAVE TO FILE UNDER SEAL**

Plaintiff Zimmer Biomet Holdings, Inc., pursuant to Local Rules 5.8 and 26.2, respectfully moves this Court for leave to file under seal portions of its Memorandum, Statement of Material Facts, filed in support of its Motion for Vacatur in this case, as well as Exhibits 2 and 3 thereto. Pursuant to Local Rule 26.2, Zimmer Biomet is (i) provisionally filing the Memorandum, Statement of Material Facts, and Exhibits 2 and 3 under seal, and (ii) providing a complete version of these documents, without any redactions, to the Court and counsel for Defendant.

Good cause exists for the order Zimmer Biomet requests. Consistent with Zimmer Biomet’s prior Motion to Seal granted by the Court (ECF 7, 13), Zimmer Biomet understands the contract to which this action relates (Exhibit 2) to impart confidentiality obligations relating to Exhibits 2 and 3, as well as the corresponding portions of the Memorandum and Statement of Facts discussing those exhibits. Further, Exhibit 2 was marked and designated as CONFIDENTIAL in the underlying arbitration to which this case relates.

Zimmer Biomet respectfully requests that the Court enter the requested order, granting Zimmer Biomet leave to file under seal its Memorandum, Statement of Material Facts, filed in support of its Motion for Vacatur in this case, as well as Exhibits 2 and 3 thereto.

Dated: August 15, 2022

Respectfully submitted,

By: /s/ Shon Lo

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*Attorneys for Plaintiff Zimmer Biomet Holdings, Inc.*

**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing document was filed and served via the CM/ECF system on August 15, 2022, upon all counsel of record.

/s/ Shon Lo  
Shon Lo